

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARCON SOLUTIONS, LLC,

Plaintiff, Counter-Defendant

-against-

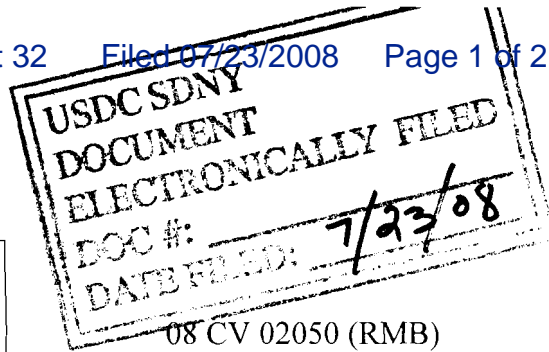
EAST 29th STREET, LLC, and
ESPAIS PROMOCIONS IMMOBILARIES EPI,
S.A.,

Defendants, Counter-claimants,

-against-

MICHAEL FALKE and MARK GEMIGNANI,

Additional Counter-Defendants.



**STIPULATION AND ORDER TO
EXTEND TIME FOR
COUNTERCLAIM DEFENDANTS
TO FILE THEIR REPLY TO THE
MOTION TO DISMISS
COUNTERCLAIMS**

WHEREAS, Counterclaim Defendants Michael Falke and Mark Gemignani have moved pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(6) to dismiss the counterclaims asserted by Defendants/Counterclaimants East 29th Street, LLC and Espais Promocions Immoilaries EPU, S.A. (the "Motion"); and

WHEREAS, Defendants/Counterclaimants' opposition to the Motion was filed on July 16, 2008;

WHEREAS, Defendants/Counterclaimants' reply is currently due July 23, 2008; and

WHEREAS, the Defendants/Counterclaimants have consented to 3 day adjournment of the date by which Counterclaim Defendants are required to file their Reply;

WHEREAS, the date on which Counterclaim Defendants were to serve their Reply was adjourned once (from July 16 to July 23) when the parties agreed to adjourn the date by which Defendants/Counter-Claimants were to file their opposition to the Motion.


IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the parties herein, that:

1. Counterclaim Defendants' reply, if any, shall be served so as to be received by July 28, 2008.

2. This Stipulation may be executed in counterparts, each of which shall be considered to be an original instrument. Fax signatures shall be deemed to be originals.

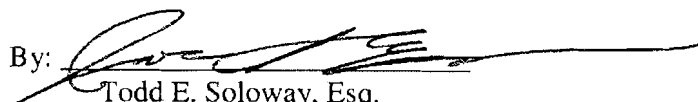
Dated: July 22, 2008

ZARCO, EINHORN, SALKOWSKI AND BRITO, PA

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*Attorneys for Defendants/Counterclaimants East
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Immobilaries EPI, S.A.*

SO ORDERED:

Date: July 23 2008


The Honorable Richard M. Berman
United States District Court Judge